

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

BWS PROPERTIES, LLC,)	NO. 1:24-CV-29-KAC-CHS
)	
Plaintiff,)	JUDGE KATHERINE A. CRYTZER
v.)	
)	MAGISTRATE JUDGE
AIRGAS USA, LLC,)	CHRISTOPHER H. STEGER
)	
Defendant.)	JURY DEMAND

**DEFENDANT AIRGAS USA, LLC’S MOTION TO EXCLUDE
TESTIMONY OF PLAINTIFF BWS PROPERTIES, LLC’S
EXPERT WITNESS NICHOLAS CORNELISON**

Defendant Airgas USA, LLC (“Defendant” or “Airgas”) files this Memorandum of Law in support of its Motion to Exclude certain of the expert opinions offered by Mr. Nicholas Cornelison on behalf of Plaintiff BWS Properties, LLC (“BWS” or “Plaintiff”) in his report dated May 9, 2025 that extend beyond pricing of items that he has actually reviewed and for which he has a reliable basis. These opinions concern the costs for certain scopes of work on the property located at 700 Manufacturers Road in Chattanooga, Tennessee that is the subject of this lawsuit. As argued more fully in Airgas’ Memorandum of Law filed contemporaneously herewith, several of Mr. Cornelison’s opinions lack sufficient factual basis and should be excluded under existing Supreme Court and Sixth Circuit case law.

In support of this motion, Airgas files the following Exhibits:

Exhibit A – Report of Nicholas Cornelison dated May 9, 2025;

Exhibit B – Budgets created by T.U. Parks Construction Co.; and

Exhibit C – Excerpts from the Deposition of Nicholas Cornelison.

Respectfully submitted,

LEWIS THOMASON, P.C.

By: /s/ Peter C. Robison

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing DEFENDANT AIRGAS USA, LLC'S MOTION TO EXCLUDE TESTIMONY OF NICHOLAS CORNELISON has been served on the following counsel of record via email and through the Court's electronic filing system:

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This the 22nd day of July 2025.

/s/ Peter C. Robison